

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
FORT PIERCE DIVISION

ALEKSEY TOVARIAN,

Plaintiff,

Case No.

v.

KATERYNA PANOVA, *et ano.*,

Defendants.

\_\_\_\_\_/

**DECLARATION OF MAKSIM KHARITONOV**

I, Maksim Kharitonov, declare as follows:

1. My name is Maksim Kharitonov. I am over the age of 18, and I have personal knowledge of the facts set forth in this declaration.

2. I currently reside in London, England. I came here in 2018 from Moscow, Russia. I have political asylum in the United Kingdom.

3. After the Russian invasion of Ukraine, around October 2022 during the time of the Russian military mobilization, I began to publish online videos about the asylum process in the United Kingdom.

4. Around that time, I began receiving inquiries from individuals who were curious about the asylum process in the United States.

5. I knew about TeachBK and Ilya Kiselev from the TeachBK YouTube and Telegram channels. I also had watched an interview with Russian blogger Varlamov, who featured Mr. Kiselev in a video about immigration into the United States through the Mexico border.

6. Mr. Kiselev's WhatsApp number was featured on the TeachBK website and I contacted him in October 2022. I asked if Mr. Kiselev wanted me to send him my inquiries about immigration to the United States. He explained that he was not interested in that. I then asked whether he was interested in expanding TeachBK into the United Kingdom, and we began conversing about that concept.

7. I have no doubts based on the conversations and statements made during them that I was in fact speaking with Mr. Kiselev from TeachBK.

8. On or about October 6, 2022, Mr. Kiselev sent me a WhatsApp voice message (the "Recording"), which is a recorded message that can be played on WhatsApp and saved.

9. On that Recording, Mr. Kiselev explained—in Russian—how TeachBK could operate in the United Kingdom based on its United States business model.

10. The audio file located at <https://soundcloud.com/slater-legal/rubic-recording> is a true and correct copy of the Recording in its original Russian.

11. Attached as Exhibit 1 hereto is a true and correct copy of a certified translation of the Recording into English.

12. I certify that no reason exists to doubt or suspect the truth or reliability of the Recording that I received from Mr. Kiselev on or about October 6, 2022.

13. In the summer of 2023, I forwarded the Recording to a reporter for Rubic.

14. I certify that the Recording was not edited in any way prior to me forwarding it to Rubic.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February \_\_\_\_\_, 2024 at London, England.  
09.02



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Maksim Kharitonov